Office:

UILC: 6231.03-00

From:

Sent: Wednesday, September 08, 2010 2:24:12 PM

To: Cc:

Subject: RE: TEFRA & SE Tax

Self employment income is trade or business income, not investment income. So you will need to clearly separate the amount of trade or business income that would be subject to self employment tax if any partner is an individual or pass-thru partner. This issue is discussed in detail on <u>Olsen-Smith v. Commissioner</u>.